

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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EDWARD PITRE,

Plaintiff,

-against-

THE CITY OF NEW YORK,  
FIRE DEPARTMENT OF THE CITY  
OF NEW YORK, JAN BORODO, individually,  
JOHN FIORENTINO individually, and  
JOSEPH M. MASTROPIETRO, individually,

Defendants.

**DECLARATION OF  
DESIREE  
ALEXANDER  
IN SUPPORT OF  
DEFENDANTS'  
MOTION FOR  
SANCTIONS AND  
ATTORNEYS' FEES  
AND COSTS**

18 CV 5950 (DC)

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**Desiree Alexander** declares, under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an Assistant Corporation Counsel in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney for defendants the City of New York, Jan Barodo, and Joseph Mastropietro (collectively, “Defendants”)<sup>1</sup> in the above-captioned action. This declaration is submitted in support of Defendants’ motion for sanctions and Attorneys’ Fees and Costs.

2. Annexed to this declaration as Exhibit “A” is a true and correct copy of the J&F Meat Market Complaint.

3. Annexed to this declaration as Exhibit “B” is a true and correct copy of the J&F Meat Market Verified Bill of Particulars.

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<sup>1</sup> The claims against Defendant Fire Department of the City of New York was dismissed, on consent, with prejudice from this action at the October 11, 2023 pre-trial hearing.

4. Annexed to this declaration as Exhibit "C" is a true and correct copy of the J&F Meat Market Stipulation of Discontinuance.

5. Annexed to this declaration as Exhibit "D" is a true and correct copy of the Trial Transcript dated January 22, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
March 1, 2024

*/s/Desiree Alexander*

Desiree Alexander